

J. Stephen Peek, Esq. (NV Bar #1758)
 Jerry M. Snyder, Esq. (NV Bar #6830)
 Adam G. Lang, Esq. (NV Bar #10117)
 Shane M. Biornstad, Esq. (NV Bar #9972)
 HOLLAND & HART LLP
 5441 Kietzke Lane, Second Floor
 Reno, Nevada 89511
 Telephone: (775) 327-3000
 Facsimile: (775) 786-6179
 speak@hollandhart.com; jsnyder@hollandhart.com;
 alang@hollandhart.com; sbiornstad@hollandhart.com

Reid H. Weingarten, Esq. (D.C. Bar #365893) (Admitted Pro Hac Vice June 15, 2007)
 Brian M. Heberlig, Esq. (D.C. Bar #455381) (Admitted Pro Hac Vice June 15, 2007)
 Robert A. Ayers, Esq. (D.C. Bar #488284) (Admitted Pro Hac Vice June 15, 2007)
 Steptoe & Johnson LLP
 1330 Connecticut Avenue, N.W.
 Washington, D.C. 20036-1795
 Telephone: (202) 429-3000

Attorneys for eTreppid Technologies, LLC and Warren Trepp

Holland & Hart LLP
 5441 Kietzke Lane, Second Floor
 Reno, Nevada 89511

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DENNIS MONTGOMERY, an individual; and
 MONTGOMERY FAMILY TRUST, a California
 Trust,

Plaintiffs,

vs.

ETREPPID TECHNOLOGIES, L.L.C., a Nevada
 Limited Liability Company; WARREN TREPP,
 an individual; DEPARTMENT OF DEFENSE of
 the UNITED STATES OF AMERICA; and
 DOES 1 through 10,

Defendants.

AND RELATED CASE(S)

Case No. 3:06-CV-00056-PMP-VPC
Base File

3:06-CV-00145-PMP-VPC

**DECLARATION OF JERRY M.
 SNYDER IN SUPPORT OF
 MOTION TO COMPEL
 PRODUCTION OF DOCUMENTS**

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**DECLARATION OF JERRY M. SNYDER IN SUPPORT OF
MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

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3 1. I am an attorney duly licensed to practice law in the State of Nevada and a partner
4 of Holland & Hart LLP, which represents eTreppid Technologies, L.L.C. and Warren Trepp in
5 this matter. The matters set forth in this declaration are true and correct and are made from my
6 own personal knowledge. If called upon, I could and would testify truthfully as to the matters set
7 forth herein.

8 2. Attached hereto as **Exhibit A** are true and correct copies of the Secured
9 Promissory Notes in the respective amounts of \$5,000,000 in favor of Warren Trepp and
10 \$20,000,000 in favor of eTreppid Technologies, L.L.C.

11 3. Attached hereto as **Exhibit B** is a true and correct copy of eTreppid Technologies,
12 L.L.C.'s and Warren Trepp's Judgment Debtor Requests for Production of Documents to Dennis
13 Montgomery.

14 4. Attached hereto as **Exhibit C** is a true and correct copy of eTreppid Technologies,
15 L.L.C.'s and Warren Trepp's Judgment Debtor Requests for Production of Documents to The
16 Montgomery Family Trust.

17 5. Attached hereto as **Exhibit D** is a true and correct copy of Dennis Montgomery's
18 Responses to Judgment Debtor Requests for Production of Documents.

19 6. Attached hereto as **Exhibit E** is a true and correct copy of The Montgomery
20 Family Trust's Responses to Judgment Debtor Requests for Production of Documents.

21 7. Attached hereto as **Exhibit F** is a true and correct copy of counsel for eTreppid's
22 April 1, 2009 meet and confer letter to counsel for Dennis Montgomery and The Montgomery
23 Family Trust.

24 8. Attached hereto as **Exhibit G** is a true and correct copy of the draft protective
25 order sent to counsel for Dennis Montgomery and The Montgomery Family Trust on April 3,
26 2009.

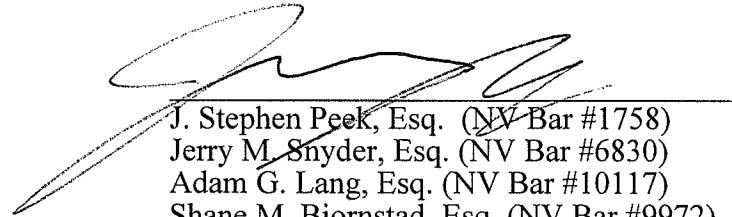
27 9. Attached hereto as **Exhibit H** is a true and correct copy of the email from Ellyn
28 Garofalo to Jerry Snyder dated April 4, 2009.

1 10. Attached hereto as **Exhibit I** is a true and correct copy of the email from Jerry
2 Snyder to Ellyn Garofalo dated April 6, 2009.

3 11. Attached hereto as **Exhibit J** is a true and correct copy of the email from Steve
4 Peek to Ellyn Garofalo dated April 7, 2009.

5 I swear or affirm under the laws of the State of Nevada that the forgoing is true and
6 correct.

7 Dated this 9 of April, 2009.



J. Stephen Peek, Esq. (NV Bar #1758)
Jerry M. Snyder, Esq. (NV Bar #6830)
Adam G. Lang, Esq. (NV Bar #10117)
Shane M. Biornstad, Esq. (NV Bar #9972)
HOLLAND & HART LLP
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511
Telephone: (775) 327-3000
Facsimile: (775) 786-6179

Reid H. Weingarten, Esq. (D.C. Bar #365893)
Brian M. Heberlig, Esq. (D.C. Bar #455381)
Robert A. Ayers, Esq. (D.C. Bar #488284)
Steptoe & Johnson LLP
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036-1795
Telephone: (202) 429-3000
Facsimile: (202) 429-3902

*Attorneys for Plaintiff and Cross-Defendant
eTreppid Technologies, L.L.C. and
Cross-Defendant Warren Trepp*

Holland & Hart LLP
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511

PROOF OF SERVICE

I, Cynthia L. Kelb, declare:

I am employed in the **City of Reno, County of Washoe, State of Nevada**, by the law offices of Holland & Hart LLP. My business address is: **5441 Kietzke Lane, Second Floor, Reno, Nevada 89511**. I am over the age of 18 years and not a party to this action. I am readily familiar with Holland & Hart LLP's practice for collection of mail, delivery of its hand-deliveries and their process of faxes.

On April 9, 2009, I caused the foregoing DECLARATION OF JERRY M. SNYDER IN SUPPORT OF MOTION TO COMPEL PRODUCTION OF DOCUMENTS to be:

 X filed electronically with the U.S. District Court and therefore the court's computer system has electronically delivered a copy of the foregoing document to the following person(s) at the following e-mail addresses:

mgunderson@gundersonlaw.com
Gunderson Law Firm
Mark H. Gunderson, Esq.
3895 Warren Way
Reno, Nevada 89509
Fax No. 775/829-1226

rsunshine@linerlaw.com;
egarofalo@linerlaw.com
Randall J. Sunshine, Esq.
Ellyn S. Garofalo, Esq.
Liner Grode Stein Yankelevitz Sunshine
Regenstreif & Taylor LLP
1100 Glendon Avenue, 14th Floor
Los Angeles, CA 90024-3503
Fax 310/500-3501

Carlotta.wells@usdoj.gov
Carlotta P. Wells, Esq.
Senior Trial Counsel
Federal Programs Branch
Civil Division – Room 7150
U.S. Department of Justice
20 Massachusetts Ave., NW
P.O. Box 883
Washington, DC 20044
Fax No. 202/616-8470

Raphael.gomez@usdoj.gov
Raphael O. Gomez, Esq.
Senior Trial Counsel
Federal Programs Branch
Civil Division – Room 6144
U.S. Department of Justice
20 Massachusetts Ave., N.W.
P.O. Box 883
Washington, DC 20044
Fax 202/616-8470

Greg.addington@usdoj.gov
Greg Addington, Esq.
Assistant U.S. Attorney
100 W. Liberty Street, Suite 600
Reno, NV 89501
Fax No. 784-5181

bpeck@lrlaw.com
Bridget Robb Peck, Esq.
Lewis and Roca, LLP
50 W. Liberty Street, Ste. 410
Reno, Nevada 89501
Fax No. 775-823-2929

Holland & Hart LLP
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511

heather.ristau@bingham.com;
roland.tellis@bingham.com;
marshall.grossman@bingham.com

Heather Ristau, Esq.
Roland Tellis, Esq.
Marshall B. Grossman, Esq.
Bingham McCutchen LLP
The Water Garden
1620 26th Street, 4th Floor, North Tower
Santa Monica, CA 90404
Fax No. 310-907-2000

brohde@rohdelaw.com
Robert E. Rohde, Esq.
Rohde & Van Kampen
1001 Fourth Avenue, Suite 4050
Seattle, Washington 98154
Fax No. (206) 405-2825

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on April 9, 2009.

/s/
Cynthia L. Kelb

Holland & Hart LLP
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511

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